FILED VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

Re:

Madam Secretary:

Please accept this document as NHLT, Inc. ("NHLT") submission of its Compliance Plan to the Commission.

If you have any questions or require any additional information, please contact me directly.

Respectfully submitted,

Enclosures

cc:

Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of Telecomnunications Carriers Eligible to Receive Universal Service Support Lifeline and Link Up Reform and Modernization NHLT, Inc Petition for Limited Designation as an Eligible Telecommunications Carrier.

COMPLIANCE PLAN OF NHLT, INC.

NHLT, Inc. ("NHLT" or "Company") is a prepaid wireless telecommunications carrier seeking designation as an Eligible Telecommunications Carrier ("ETC") solely for the purpose of participating in the Lifeline program. NHLT requests that the Commission forbear from applying the "own facilities" requirement contained in section 214(e)(1)(A) of the Communications Act, 47 C.F.R. § 214(e)(1)(A), consistent with the Commission's determination to forbear from applying this requirement to Lifeline-only ETC applications that comply with the conditions set forth in the *Lifeline Reform Order*.

NHLT hereby files its Compliance Plan outlining the measures it will take to implement the conditions set forth in the *Lifeline Reform Order*. NHLT respectfully requests expeditious approval of this Compliance Plan so that the Company, upon designation as an ETC by the FCC and other state commissions, may quickly begin providing essential Lifeline services to eligible low-income customers.

1. INFORMATION ABOUT NHLT, INCLUDING FINANCIAL AND TECHNICAL QUALIFICATIONS

NHLT, based in White River Junction, Vermont, has been in business since 2008. The Company provides wireless services. NHLT currently derives the majority of its revenue from selling low-cost prepaid telephone services on a nationwide basis and employs approximately 10 people. NHLT will not need to rely exclusively on USF support to provide wireless Lifeline services.

NHLT operates its own switching facilities in Jersey City, New Jersey. In addition to providing access to directory assistance and operator services, the switching facilities are also used to provide access to some interexchange services (for the routing of certain domestic and all non-domestic) calls. NHLT has also invested in software development, including its own customized mobile app.

NHLT has not been subject to any enforcement action at the FCC or in any state. No ETC designations held by NHLT have been rescinded, revoked or terminated by the FCC or by any state.

NHLT operates its wireless business under the name TalkforGood.

2. BACKGROUND

In the *Lifeline Reform Order*, the Commission stated that it would grant forbearance from the "own-facilities" requirement contained in Section 214(e)(l)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to compliance with the following conditions: (1) the carrier must comply with certain 911 requirements: (a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline eligible subscribers who obtain Lifeline-supported services; and (c) complying with conditions (a) and (b) starting on the effective date of this Order; and

(2) the carrier must file, and the Bureau must approve, a compliance plan that: (a) outlines the measures the carrier will take to implement the obligations contained in this Order, including but not limited to the procedures the ETC follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Fund, materials related to initial and ongoing certifications and sample marketing materials, as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary; and (b) provides a detailed description of how the carrier offers service, the geographic areas in which it offers service, and a description of the carrier's various Lifeline service plan offerings, including subscriber rates, number of minutes included and types of plans available.

III. COMPLIANCE PLAN

NHLT will comply with all of the conditions set forth in the *Lifeline Reform Order* and Sections 54.101 et. seq. of the Commission's Rules (as amended by the *Lifeline Reform Order*), the provisions of its Compliance Plan, and all laws and regulations governing its provision of Lifeline-supported prepaid wireless service to customers throughout the United States.

A. Access to 911 and E911 Services

The *Lifeline Reform Order* requires ETCs to provide their Lifeline customers with access to 911 and E911 services, regardless of activation status and availability of minutes. NHLT, INC hereby affirms that all of its customers will have access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available from NHLT handsets even if the account associated with the handset has no minutes remaining.

B. E911-Compliant Handsets

The Commission also conditioned its grant of forbearance on ETCs providing only E911 compliant handsets to its Lifeline customers. NHLT will ensure that all handsets used in connection with the Company's Lifeline service offering are E911 compliant. In the event that an existing NHLT customer does not have an E911 compliant handset, the Company will replace it with a 911/E911 compliant handset at no charge to the customer. Any new customer that qualifies for and enrolls in the Lifeline program will receive a 911/E911 compliant handset, free of charge.

C. Certification and Verification of Lifeline Eligibility

NHLT proposes the following plan to implement the certification and verification conditions outlined in the *Lifeline Reform Order*. NHLT intends to keep these measures in effect until such time as the Commission implements its planned National Lifeline Accountability Database. NHLT shares the Commission's concern about waste, fraud and abuse of the Lifeline program and is committed to the safeguards stated herein.

1. Policy

NHLT will comply with all certification and verification requirements for Lifeline eligibility established by states where it is designated as an ETC. In states where there are no state-imposed requirements, NHLT will comply with the certification and verification procedures in effect in that state as reflected on the website of the Universal Service Administrative Company ("USAC"). For any states which do not mandate Lifeline support and/or which do not have established rules of procedure in place, NHLT will certify at the outset and will verify annually customers' Lifeline eligibility in accordance with the Commission's requirements

2. Certification Procedures

NHLT will implement certification procedures that require consumers to demonstrate their eligibility for Lifeline assistance by contacting the Company in person or via mail, telephone, facsimile, or the Internet. At the point of sale, consumers will be provided with printed information describing NHLT's Lifeline program with instructions for enrolling, including eligibility requirements. Consumers will be signed up in person or directed, via company literature, collateral or advertising, to a toll-free telephone number and to the Company website, which will contain a link to information regarding the Company's Lifeline service plans, including a detailed description of the program and state-specific eligibility criteria. NHLT's application form will clearly identify that it is a "Lifeline" application. Except in states in which applicants are enrolled through a designated state agency, NHLT will have direct contact with all customers applying for Lifeline service, in person or by telephone, facsimile, mail or the Internet.

NHLT will provide Lifeline-specific training to all personnel, whether employees, agents or representatives, who interact with actual or prospective consumers with respect to obtaining, changing or terminating Lifeline services. Consumers who do not complete the application process in person must return the signed application and support documentation to the Company by mail, fax, email or other electronic transmission. The Company will accept electronic signatures that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC 7001-7006, and any applicable state laws, and may verify consumers' signatures via interactive voice response (IVR) systems. Processing of consumers' applications, including review of all application forms and relevant documentation, will be performed under the Company's supervision by personnel trained in the administration of the Lifeline program. NHLT will ensure that all required documentation is reviewed and handled properly by using state-specific compliance checklists.

For states with program-based eligibility criteria, the form will list each of the qualifying programs, and the applicant will be required to identify the specific program(s) in which they participate, and to provide the requisite proof that they currently participate in such program(s), regardless of whether such proof is required pursuant to state law. For states with income-based eligibility criteria, the applicant will be required to certify under penalty of perjury that their household income does not exceed the relevant threshold (e.g, 135% of the Federal Poverty Guidelines for federal default states) and will be required to provide the requisite proof of income-based eligibility. NHLT will not retain copies of proof documentation, but rather will maintain accurate records detailing how the customer demonstrated his or her eligibility.

NHLT will check the eligibility of low-income consumers seeking to enroll in Lifeline either by accessing electronic eligibility databases, where available, or by reviewing documentation from the consumer demonstrating his/her eligibility for Lifeline service. Where the Company is able to access a state or federal database to make determinations about customer eligibility, the Company is not required to obtain proof documentation; in such case NHLT or its representative will note in its records what specific data was relied upon to confirm the customer's initial eligibility for Lifeline. In instances where a state agency or third-party administrator is responsible for the initial determination of consumer eligibility, NHLT will rely on the state identification or database. In addition, the Lifeline application form will include a certification section where the applicant must attest and sign under penalty of perjury that the applicant's representations are true and correct. Applicants will also be required to initial a number of disclosure statements intended to ensure that the applicant understands applicable eligibility requirements-including a statement to the effect that to the best of his or her knowledge, the applicant is not receiving Lifeline-supported service from any other Lifeline provider. Penalties for perjury will be clearly stated on the certification form. The certification

form will also contain language stating that violation of the one-per-household requirement constitutes a violation of the Commission's rules and will result in the consumer's de-enrollment from the program, and could result in criminal prosecution by the United States government. Although the exact wording of the disclosure statements described above may vary on a state-by-state basis, depending on state-specific requirements and/or consultations with relevant state agencies, NHLT expects the substance of these disclosures to be consistent with the certifications set forth in the enclosed Lifeline Application and Certification Form. See Exhibit 1.

Finally, the application forms will require each applicant to provide the following information:

- Name
- •Primary residential address and whether the address is a permanent address
- •Billing address (if this differs from the residential address)
- •Last four digits of social security number
- •Birth date

After the National Database is established, NHLT will provide the above information to the database, together with the following additional information:

- Telephone number (for Lifeline handset)
- •Date of service initiation
- Date of de-enrollment (if applicable)
- Means by which the subscriber qualified for support
- Amount of Lifeline support received by the subscriber each month
- Whether the subscriber receives Link Up support

The application form will clearly state that Lifeline participants must provide their new address to the Company within 30 days of moving. NHLT will incorporate this information into its customer information database. Prior to initiating service for a customer, the Company will check the address of each Lifeline applicant against its database to determine whether or not it is associated with a customer that already receives NHLT Lifeline service, and will then review the application to ascertain whether the applicant is attempting to receive Lifeline-supported service for more than one handset associated with its household. If the Company

determines that an individual at the applicant's residential address is currently receiving Lifeline-supported service, the Company will take an additional step to ensure that the applicant and the current subscriber are part of different households. In order to make this determination, NHLT will require applicants to complete and submit to the Company a written document which will be developed by USAC. NHLT will deny the Lifeline application of any individual residing at the same address as a current Lifeline subscriber who is part of the same household, and will advise the applicant of the basis for the denial. NHLT also will de-enroll within ten (10) business days any subscriber whom the Company knows is receiving Lifeline-supported service from another ETC or knows is no longer eligible. In the event that the Company is notified by the Administrator that a subscriber is receiving duplicative support, the Company will de-enroll that subscriber from participation in the Lifeline program within five (5) business days.

If the subscriber provides NHLT with a temporary address, the Company will verify with the subscriber every 90 days that this address remains valid. If the subscriber fails to respond to the Company within 30 days, the subscriber will be de-enrolled from the Lifeline program.

3. Annual Verification Procedures

As required by the Commission's *Lifeline Reform Order*, NHLT will require every consumer enrolled in the Lifeline program to verify on an annual basis that he or she is the head of his or her household, receives Lifeline-supported service only from NHLT and, to the best of his or her knowledge, no one else in the subscriber's household is receiving a Lifeline-supported service. Pursuant to the new rule adopted in the *Lifeline Reform Order*, NHLT will re-certify the eligibility of all of its Lifeline subscribers as of June 1, 2013, by the end of 2013, and report the results to USAC by January 31, 2014. The Company may undertake this recertification on a rolling basis throughout the year. Where ongoing eligibility cannot be determined through access to a qualifying database either by the Company or the state, and there is no state administrator verifying the continued eligibility of Lifeline subscribers, the Company will re-certify the continued eligibility.

of its subscribers by contacting them-either in person, in writing (by mail), by phone, by text message, by email, or otherwise through the Internet-to confirm their continued eligibility. Such certifications may be obtained in person through a written document, an IVR system, a text message, or on-line with an electronic signature. The Company will accept electronic signatures that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC 7001-7006, and any applicable state laws, in accordance with the *Lifeline Reform Order*. In states where a state agency or a third party has implemented a database that carriers may query to re-certify the consumer's continued eligibility, the Company (or state agency or third-party, where applicable) will instead query the database and maintain a record of what specific data was used to re-certify eligibility and the date of re-certification.

The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits will be terminated if such actions are not taken, and how to contact NHLT. Consistent with the *Lifeline Reform Order*, the Company will provide notice of impending Lifeline service termination to subscribers who do not respond to the annual re-certification within 30 days. Anyone who does not respond to the impending termination notice within 30 days to demonstrate that his or her Lifeline service should not be terminated will be de-enrolled from the Company's Lifeline program.

D. Specific Customer Enrollment Procedures

NHLT prefers direct contact with consumers. NHLT plans to open multiple stores in each state where it is designated. NHLT sells the remainder of its service through Internet sales and inbound telemarketing (where a customer is seeking to initiate service with NHLT).

As an initial matter, in those few states that have a state administrator, NHLT fully cooperates with the state Lifeline administrators to ensure that it does everything necessary to ensure it is in compliance with both state and federal enrollment, verification, and re- certification procedures. For all states that do not have a Lifeline administrator, NHLT will perform the same first step in the process of enrollment. Regardless of how the customer applies-whether in a retail store, online, or over the phone, each customer will supply the same information via NHLT's standard customer application and certification form. (Attached as **Exhibit 1.**)

NHLT enrolls Lifeline customers through several different marketing channels: 1) **in** person, through our dealer network, 2) in person, through retail agents trained by NHLT, and 3) through customer-initiated contact, either through inbound telemarketing, or more frequently, through online sales over the Internet. The majority of NHLT's sales are through its "in person" channels.

All of NHLT's retail sales are the result of direct contact with the potential Lifeline consumer.

Dealer Network.

The prospective customer comes to the dealer, and is asked the basis for his or her claim to Lifeline eligibility. The dealer can verify the customer's program, or income based eligibility in person. NHLT provides comprehensive training reference materials to its dealers which allow the dealers to verify the most common forms of proof for each eligible program and/or income verification. The store employee will then ask the prospective customer for additional documentation proving identity and/or address verification. The final program/income eligibility-specific step is for the customer to provide the required information and make the certifications required by new rule §S4.410(d)(3).

If the customer appears to be eligible, the employee will explain the Commission's definition of "household" as an "economic unit" where related or unrelated people share income and expenses. In the case of multiple applicants at the same mailing address, the customer will then make the "one per household" certification required by §S4.41O(d)(1). Finally, NHLT will collect the necessary customer-specific information required by new rule §S4.40l(d)(2) so that NHLT can report the information to USAC to be used to populate the National Lifeline Accountability Database ("duplicates database"), defined in §S4.400(i) of the Commission's new rules. The retail store employee then enters the customer's information into NHLT's OSS systems, where the information is checked against available databases (the duplicates database, and NHLT's own list of existing customers). The retail store rep quickly determines whether the customer is eligible to receive Lifeline service. In cases where a state program eligibility database exists, the retail store personnel will contact NHLT's internal group dedicated to verifying eligibility who will query the state database and either approve or deny the applicant. Where proof of eligibility is needed, the retail personnel, who are trained on what is eligible documentation will witness the documentation and sign the application demonstrating they have witnessed the documentation.

Upon successful completion of the certification process, the customer chooses a service plan and is provided with a handset. The customer's account is activated upon completion of an outbound call. For purposes of "enrollment" in the Lifeline program, NHLT will use the date of his first completed outbound call from its call records as the customer's effective start date.

Retail Agents.

The process for signing up customers at NHLT's retail agents is very similar to the process used by NHLT for signing up customers at its owned stores. The prospective customer comes into the agent's retail location, and is asked the basis for his or her claim to Lifeline eligibility. The agent's employee can verify the customer's program, or income, based eligibility in person. NHLT provides comprehensive training and reference materials to its dealers which allow the dealers to verify the most common forms of proof for each eligible program and/or income verification. The agent's employee will then ask the prospective customer for additional documentation proving identity and/or address verification. The final program/income eligibility-specific step is for the customer to provide the required information and make the certifications required by new rule §54.41 O(d)(3).

If the customer appears to be eligible, the dealer will explain the Commission's definition of "household" as an "economic unit" where related or unrelated people share income and expenses. In the case of multiple applicants at the same mailing address, the customer will then make the "one per household" certification required by §54.41 O(d)(l). Finally, the dealer will collect the necessary customer-specific information required by new rule §54.40l(d)(2) so that NHLT can report the information to USAC to be used to populate the National Lifeline Accountability Database ("duplicates database"), defined in §54.400(i) of the Commission's new rules.

The dealer then faxes the completed certification form to NHLT's Agent Services department, where an employee enters the data into NHLT's OSS systems. The OSS systems check the data against available databases (the duplicates database, and NHLT's own list of existing customers). Where proof of eligibility is needed, the dealers, who are trained on what is eligible documentation, will witness the documentation and sign the application demonstrating they have witnessed the documentation.

Review of the documents and appropriate databases is completed by NHLT employees. If NHLT confirms that the customer is eligible, a handset will be mailed to the customer. The customer's account is not activated until completion of an outbound call. For purposes of "enrollment" in the Lifeline program, NHLT will use the date of this first completed outbound call from its call records as the customer's effective start date.

Inbound Channel Marketing.

Prospective customers can also apply for, and obtain, Lifeline service from NHLT either over the phone or through the Internet. Customers choosing to obtain service through inbound channels must either fill out an application online, or provide the relevant information to the customer sales representative over the telephone. In these cases, NHLT verifies eligibility via a state database, state administrator, or by reviewing documentation of eligibility submitted by the applicant in advance of receiving service.

Online Sales.

To apply for NHLT Lifeline service online, a customer will fill out an application, provide the necessary information that all prospective Lifeline customers must provide, and be taken through successive screens, which clearly explain all relevant legal eligibility requirements. If the customer is seeking to qualify for Lifeline service based on their participation in a particular program (or income level), the prospective customer may be able to be qualified by an inbound sales representative who inputs the prospective customer's information into an eligibility database (if available for the relevant state). However, in most cases, the prospective customer will fill out the relevant eligibility forms on the computer, and then send in copies of the records needed by NHLT to verify the customer's eligibility to participate in Lifeline. Once the prospective customer is successfully verified by NHLT, the customer can be enrolled in the service plan they have chosen, and then mailed their handset.

Assuming the customer has successfully completed the online application process, NHLT will have all the information it needs to verify the customer is only receiving one Lifeline subsidy for their household, to verify eligibility, to satisfy its record-keeping obligations, and to send to USAC in order to populate the duplicates database. The requisite certifications needed by NHLT to establish service with the prospective customer is obtained as electronic signatures.

NHLT's method of accepting electronic signatures-on all of its online certifications and re-certifications-is to allow the customer to create a unique electronic signature by typing their name, and providing their date of birth and their social security number. The customer's name, combined with their date of birth and their social security number, is sufficiently unique to satisfy the Commission's new rules for accepting electronic signatures.

If the prospective customer fails to qualify for Lifeline service, NHLT will explain to the customer why the request was rejected. On the other hand, if the prospective customer sends in sufficient evidence to qualify for Lifeline eligibility, and adequately certifies eligibility, NHLT will notify the customer, and enroll the customer

in their requested service plan, and send the customer the handset. The customer's account is not activated until completion of an outbound call. For purposes of "enrollment" in the Lifeline program, NHLT will use the date of this first completed outbound call from its call records as the customer's effective start date.

Inbound Telemarketing.

To obtain NHLT Lifeline service, a customer can call NHLT to initiate service. The process is very similar to online enrollment, except that instead of being taken through successive screens, the customer is asked a series of qualifying questions by a customer service representative. The questions will all be designed to elicit true and accurate information that is necessary for NHLT to obtain a complete standard certification form. If, at any time during the conversation, it becomes apparent to the customer service representative that the prospective customer is unlikely to qualify for NHLT Lifeline service, the customer service representative explains the issue to the customer and offers to allow the customer to sign up for one of NHLT's non-Lifeline service plans.

On the other hand, if the customer provides information indicating that the customer would be eligible to obtain Lifeline service, the customer service representative will take the customer as far as possible in trying to qualify the customer. For example, if there are no other Lifeline subscribers in the customer's household, and the customer participates in a Lifeline eligible program (or is income-qualified), the customer service representative tries to verify the customer's information through a state database (if available). If the customer seems to qualify (through a database query), then the customer service representative will open a file for the customer, take the customer's information that is required to be collected from each customer, send the customer the requisite certification forms for verification of eligibility (or allow the customer to certify eligibility through an IVR recorded and associated with the customer's account), and request copies of the evidence that would prove eligibility in cases where a state database is not available.

If the prospective customer fails to qualify for Lifeline service, NHLT will explain to the customer why the request was rejected. On the other hand, if the prospective customer sends in sufficient evidence to qualify for Lifeline eligibility, and adequately certifies eligibility, NHLT will notify the customer, and enroll the customer in their requested service plan, and send the customer the handset. The customer's account is not activated until completion of an outbound call. For purposes of "enrollment" in the Lifeline program, NHLT will use the date of this first completed outbound call from its call records as the customer's effective start date.

E. Additional Measures to Prevent Waste, Fraud, and Abuse

1. Non-usage Policy

As required by the Lifeline Reform Order, NHLT will implement a non-usage policy whereby it will de-enroll

Lifeline customers that have not used the Company's Lifeline service for 60 consecutive days. NHLT will notify its subscribers at service initiation about the usage requirements and the de-enrollment and deactivation that will result following non-usage in any consecutive 60-day period of time. If no usage appears on a NHLT Lifeline customer's account during any consecutive 60-day period, NHLT will deactivate Lifeline services for that customer. An account will be considered active if during any 60-day period the authorized subscriber does at least one of the following: makes a monthly payment; purchases minutes from the Company to add to his or her existing pre-paid Lifeline account; completes an outbound call; answers an incoming call from anyone other than the Company, its representative, or agent; or affirmatively responds to a direct contact from the Company confirming that he or she wants to continue Lifeline service.

2. Customer Education with Respect to Duplicates

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, NHLT will implement measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence, and will help ensure that only eligible consumers enroll in the program and that those consumers are fully informed of the rules and requirements of the program.

In its marketing materials, including application forms, on its web site, and in its direct contact with applicants, the Company will emphasize in plain, easily comprehensible language that: (1) Lifeline is a federal benefit; (2) Lifeline service is available for only one line per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; and (4) a household is not permitted to receive Lifeline benefits from multiple providers. NHLT will also include in its marketing materials substantially the following information in clear, easily understood language: the offering is a Lifeline-supported service; that only eligible consumers may enroll in the program; what documentation is necessary for enrollment; and that the program is limited to one benefit per household, consisting of either wireline or wireless service. In order to reinforce the limitation of one Lifeline phone per household, the following statement will appear in the Company's marketing materials and websites (www.talkforgood.com) in a conspicuous place, in bold font and in an offsetting color to ensure it is not overlooked:

Note: By law, the Lifeline program is only available for one phone per household

NHLT will disclose the company names under which it does business and the details of its Lifeline service offerings. A sample marketing brochure is enclosed as Exhibit 2.

3. Cooperation with state and federal regulators

NHLT has and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse, including:

- •Providing a certification to USAC that the Company has procedures in place to review customer's documentation of income- and program-based eligibility. That certification will also confirm that NHLT is in compliance with all federal Lifeline certification procedures and Lifeline program rules, and that NHLT has obtained a valid certification form for each Lifeline customer
- •Providing the FCC and USAC each year with general information regarding the terms and conditions of the Lifeline plans that the Company offered during the previous year, including the number of minutes provided, and whether there are additional charges to consumer for service, including minutes of use and/or toll calls.
- •Providing state commissions (PUC), the FCC or USAC upon request with data that will enable that state, the FCC or USAC to determine whether some consumers are enrolled in more than one Lifeline program. Specifically, the Company agrees to make available state-specific customer data, including name and address, upon request to each state PUC where it operates, the FCC or USAC for the purpose of permitting the PUC, FCC or USAC to determine whether an existing Lifeline customer receives Lifeline service from another carrier, and will participate in such a duplicate resolution process, provided that costs for participation are reasonable or defrayed through the universal service contribution mechanisms;
- Promptly investigating any notification that it receives from a state PUC, the FCC or USAC that one of its customers already receives Lifeline service from another carrier;
- •Immediately deactivating a customer's Lifeline service and no longer report that customer on USAC Form 497 if the Company's investigation, a state, the FCC or USAC concludes that the customer receives Lifeline services from another carrier in violation of the Commission's

regulations and that the Company's Lifeline service should be discontinued such as a deenrollment notification pursuant to the FCC's June 17,2011 Report and Order (Section III, B.).

• Complying with all audit requirements set forth in the *Lifeline Reform Order*.

F. Lifeline Offering

NHLT will offer its Lifeline service in the states where it is designated as an ETC throughout the coverage area of its underlying carrier, Verizon Wireless.

As summarized in Exhibit 3 attached hereto, the Company's Lifeline offering will provide customers with the option to choose between two (2) Lifeline plans that best meets their needs. Additional minutes will be loaded electronically. Customers can purchase extra minutes at retail outlets frequented by low-income customers throughout the Company's service area and online. All of NHLT's Lifeline plans will include a free handset and the following custom calling features: Caller ID, Call Waiting, and Voicemail. NHLT does not impose credit checks or long-term service contracts on its prepaid customers. Customers are not bound by a local calling area requirement; all NHLT plans come with domestic long distance at no extra per minute charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

NHLT's Lifeline Plans vary from state to state in accordance with state requirements; the two Lifeline plans outlined in this Compliance Plan would be offerings available in all states in which the FCC has jurisdiction over competitive ETC applications. Please see the Company's websites (www.talkforgood.com) for more detailed information regarding plans available in each state.

IV. CONCLUSION

NHLT submits that its Compliance Plan fully satisfies the conditions of forbearance set forth in the Commission's *Lifeline Reform Order*. Implementation of the procedures described herein will promote public safety and ensure that Lifeline customers have access to 911 and E911 services while safeguarding against misuse of the Company's Lifeline services. Accordingly, NHLT respectfully requests that the Commission expeditiously

approve its Compliance Plan so that the Company may begin providing the benefits of much-needed Lifeline service to qualifying low-income consumers as quickly as possible.

Respectfully submitted,

NHLT, INC.

VP for NHLT, Inc.

January 15, 2013

Attachments (Certification, Exhibits 1 - 3)

CERTIFICATION

- I, Thomas Lyons, do hereby declare under penalty of perjury as follows:
 - •I am a VP of NHLT, Inc., a New Hampshire Corporation, with its principal place of business at 75 S Main Street, White River Junction, VT 05001
 - •I have read NHLT's revised Compliance Plan and confirm the information contained therein to be true and correct to the best of my knowledge.
 - •I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Thomas Lyons

VP of NHLT, Inc.

January 15, 2013.

Exhibit 1:

Sample Lifeline Application and Certification (_)

LIFELINE CERTIFICATION FORM

TalkforGood LifeLIne

First

[] Initial Lifeline Enrollment [] Re-Verification of Lifeline Enrollment www.talkforgood.com

PERSONAL INFORMATION	
PLEASE FILL OUT THE FOLLOWING INFORMATION:	
First Name:	Middle Name:
Last Name:	Date of Birth:/
Social Security # (last four digits): Tribal Identification # : Email Address:	Alt. Contact #: ()
I certify that I reside on a Federally recognized Tribal land. (For Tribal Residen	ts Only)
PLEASE READ AND ACKNOWLEDGE YOU AGREE BY INITIALING EACH STATEMEN	T BELOW, UNDER PENALTY OF PERJURY
The information contained within this application is true and correct. I acknow documentation in order to demonstrate eligibility for the lifeline program is punish	• •
I understand that Lifeline is a federal government benefit program and that or Lifeline program.	nly qualified persons may participate in the
_ I understand that Lifeline is only available for one phone line per household, values providers include: Budget Home Phone, AT&T, Safelink, and Assurance Wireles household is receiving Lifeline service. A household is defined, for purpose of the together at the same address and share income and expenses.	ss. To the best of my knowledge no one in my
I certify that I am at least 18 years of age and not currently receiving a lifeline wireless telephone company. I will only receive lifeline from NHLT and no other I violation of the one phone line per household limitation will result in de-enrollmer punished by fine or imprisonment.	andline or wireless telephone company. Any
I will not transfer my service to any other individual, including another eligible	low-income consumer.
I authorize NHLT to access any records required to verify my eligibility for life any of my records required for the administration of the lifeline program.	line service. I also authorize NHLT to release
I understand that I will be required to verify my continued eligibility for NHLT's may be required to verify my continued eligibility at anytime, and that failure to debenefits. I will notify NHLT immediately if I no longer qualify for Lifeline, or if I have	o so will result in termination of Lifeline
I will notify NHLT within thirty (30) days if my home address changes. If the arl understand that I must verify my address every ninety (90) days. Failure to provin de-enrollment from the program.	ddress I have provided is a temporary address, vide such notification or verification may result
I authorize NHLT to contact me by interactive voice response (IVR), or other verification and the company's 60-day non-usage reminder.	means, to notify me of annual Lifeline re-
I understand that completion of this application does not constitute immediate	e approval for Lifeline service.
ELIGIBILITY	
QUALIFYING BENEFICIARY (Complete if a dependent residing in your household is r	receiving benefits from the programs listed below.)
PLEASE CHECK ALL THAT APPLY AND PRESENT BUDGET EMPLOYEE WITH PROOF [] Food Stamps (SNAP) [] Federal Housing Assistance (Section 8) [] [] Supplemental Security Income (SSI) [] Temporary Assistance for Needy Families [] Medicaid [] Low Income Home Energy Assistance Program [] [] Tribally-Administered Temporary Assistance for Needy	National School Lunch (Free Program Only) [] Food Distribution Program on Indian Reservations (FDPIR)] Bureau of Indian Affairs General Assistance (BIA)

(Note: Proof of program qualification not required during annual re-verification of Lifeline eligibility.)

PAGE 1 OF 2

LIFELINE CERTIFICATION FORM

TalkforGood LifeLine

www.talkforgood.com

_ INCOME QUALIFICATION: Persons whose household income is at or below 135% of national poverty level qualify for Lifeline credit. This
option is only available at a TalkforGood dealer location. Customer must provide proof of income.
How many people are in your Household? Persons in HH - 135% Annual Income (at or below)
(1) \$15,080 (2) \$20,426 (3) \$25,772 (4) \$31,118 (5) \$36,464
Add \$5,346 for each additional person.
TO QUALIFY BASED ON YOUR INCOME, YOU MUST PROVIDE COPIES OF ONE OR MORE OF THE DOCUMENTS LISTED BELOW. IF YOU PROVIDE DOCUMENTATION THAT DOES NOT COVER A FULL YEAR (SUCH AS CURRENT PAY STUBS), YOU MUST SUBMIT THREE (3) CONSECUTIVE MONTHS OF THE SAME TYPE OF DOCUMENT WITHIN THE PREVIOUS 12 MONTHS.
 Current income statement from employer or paycheck stub Unemployment/Workers Compensation benefits statement Retirement/Pension benefit statement Prior year's state, federal or tribal tax return (NOTE: Proof of income qualification not required during annual re-verification of Lifeline eligibility.)
RESIDENTIAL ADDRESS (No PO boxes, must be your principal address) This address is:
[] Permanent [] Temporary [] Multi-Household
I share an address with another person(s) over the age of 18. However, they do not contribute income to my household or share in the household expenses. [] Yes [] No (If Yes, USAC provided multi household form is to be completed and attached. Form can be obtained from Budget employee.)
Street Address:
Name of Apt. Complex/Multi Resident Facility:
Apt. No.: Multi Resident Facility Room/Bed No.:
City: State: Zip Code:
- 7
BILLING ADDRESS
- ·
BILLING ADDRESS [] Same as Residential Address Street Address: Name of Apt. ComplexIMulti Resident Facility:
BILLING ADDRESS [] Same as Residential Address Street Address: Name of Apt. ComplexIMulti Resident Facility: Apt. No.: Multi Resident Facility Room/Bed No.: 1
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BILLING ADDRESS [] Same as Residential Address Street Address: Name of Apt. ComplexIMulti Resident Facility: Apt. No.: Multi Resident Facility Room/Bed No.: 1 City: Penalty of Perjury Under Title 18 U.S.C. §1621, whoever will state as true any material matter which he does not believe to be true in a statement under penalty of perjury, is guilty of perjury and shall, except as otherwise expressly provided by lay, be fined or imprisoned not more than five years, or both. *BY LAW THE LIFELINE PROGRAM IS ONLY AVAILABLE FOR ONE PHONE PER HOUSEHOLD, WHETHER LANOLINE
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BILLING ADDRESS [] Same as Residential Address Street Address: Name of Apt. Complex/Multi Resident Facility:

Specific Documentation Presented by Customer and Examined by Company Representative

Store Representative Signature	 Date

Exhibit 2:

Sample Marketing Brochure – see detached file.

Exhibit 3:

Lifeline Offerings

Plan Description	Retail Price
Active User Talk & Text*	
Non Lifeline	\$40.00
Lifeline	\$25.00
250 Minute Talk	
Non Lifeline	\$12.50
Lifeline	Free

All plans include, at no extra charge: Free Handset; Caller ID; Call Waiting; and Voicemail. Voicemail calls count against the voice minutes provided by the plan.

Prices for the Active User Talk & Text Plan, the 250 Minute Talk (non-Lifeline), and the purchase of additional minutes or the text message add-on do not include taxes or mandatory government fees (where applicable). Although NHLT must pay taxes or government fees in certain states, these taxes or government fees are not assessed to Lifeline customers subscribing to the 250 Minute Talk plan.

*The Active User Talk & Text Plan provides for a combined 4000 voice minutes and text messages. Each text message counts as one minute of voice service.

Additional Minutes for 250 Minute Talk	
50 minutes	\$5.00
100 minutes	\$10.00
150 minutes	\$15.00

^{*} Applicable taxes and government fees are assessed to the above Plan Additions.

^{**}The Text Message Add-on provides 1000 text messages.

Lifeline Credits

Federal Lifeline Credit

\$9.25

Service Period for all plans: All airtime (airtime associated with a particular plan, as well as additional purchased minutes, text messages or other services), expires at the end of each 30-day cycle whether subscriber uses the airtime or not. No airtime (whether associated with a particular plan or purchased separately) is carried over to the next 30-day period.